



## State of New Jersey

Department of Environmental Protection

James E. McGreevey  
Governor

Bradley M. Campbell  
Commissioner

Christopher Anderson  
Director Environmental Affairs  
L.E. Carpenter and Company  
33587 Walker Road  
Avon Lake, OH 44012

OCT 19 2004

Re: L.E. Carpenter Superfund Site  
Wharton, Morris County, New Jersey

The New Jersey Department of Environmental Protection (NJDEP or Department) has completed a review of the Quarterly Monitoring Report – 2nd Quarter 2004 dated September 2, 2004. This document was prepared by RMT, Inc. on behalf of L.E. Carpenter and Company (LE). The NJDEP has the following comments which must be addressed. LE shall submit a workplan to address the following comments within thirty (30) days after receipt of this correspondence.

### General Comments:

The NJDEP noted the increase in the DEHP levels in well MW-11D(R) in the 3<sup>rd</sup> quarter 2003. This well monitors the deep overburden aquifer and is installed in the heart of the product plume. The deep overburden aquifer is unimpacted by site related contamination, but recently there has been a steady increase in DEHP levels, followed by non-detect for three-quarters. LE indicates that these wells will be abandoned and sealed. LE should be aware that the NJDEP cannot concur with this proposal at this time. Several additional quarters of sampling must be completed before the Department can approve this proposal. LE shall provide clarification as to why these wells were not sampled in the 2<sup>nd</sup> quarter 2004.

### Specific Comments:

MW19/Hot Spot 1 Groundwater Monitoring, page 4-2: The report states that MW19-10 installed as part of the MNA program for this area may not be located properly. According to Figure 6, the direction of the concentrated plume may be toward and potentially across Ross Street. As it appears that MW19-10 may not be located correctly to intercept the plume an alternative location(s) shall be proposed. The NJDEP recommends that a well be located along Ross Street approximately 50 feet east of MW-19-8.

Surface Water Monitoring, page 5-2: The report states that no samples of the sheen have been collected and no samples of the ditch surface water were collected during the 2<sup>nd</sup> Quarter 2004 event, due to access issues. LE is advised that the discharge points at the Rockaway River and the Drainage Ditch shall be sampled immediately. Surface water sampling at the discharge points shall be added to the quarterly monitoring event and sampled quarterly thereafter.

Appendix G, Revised Figure 8 from the RAWP: As reported in the document and depicted on Figure 8, the proposed footprint of the source reduction excavation has been expanded. If the revised RAWP calls for an excavation up to the Rockaway River, then safe guards including engineering controls to prevent further discharge of product to the river during construction must be provided.

Low Flow Sampling: In the review of the 4<sup>th</sup> quarter 2003, sampling report, the Department required that LE profile sample each well in the sampling program to identify the most contaminated zone. One low-flow sample at the center of each five-foot screen interval must be collected. Once the most contaminated zone is identified, subsequent sampling will target this zone. LE must also periodically profile sample the monitoring wells to confirm that the most contaminated zone is being sampled. The most contaminated



zone can change due to climatic conditions, ground water stresses, etc. This requirement must be completed.

LE indicates that profile sampling is currently being addressed via sampling of various wells completed at different depths within the unconfined aquifer. The NJDEP requests clarification of this statement as profiling is typically completed before a sampling program is initiated. LE should be aware that this requirement must be completed and the results submitted to the Department.

Should you have any questions please feel free to contact me at (609) 633-1416.

Sincerely,



Anthony Cinque, Case Manager  
Bureau of Case Management

C: Nick Clevett, RMT  
Steve Cipot, USEPA  
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John Prendergast, BEERA